



October 26, 2018

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa
Gulf South Pipeline Company, LP
Koch Fee Well Compressor Station (Agency Interest # 105589)
Permit No. 0400-00107-02**

To Whom It May Concern:

Gulf South Pipeline Company, LP (Gulf South) is submitting this annual report for its Koch Fee Well Compressor Station, located in Bossier Parish, as required by 40 CFR 60.5420a(b). The facility is located at 32.38706° North, -93.44039° West. To reach the site, take Highway 527 east from Koran for roughly 0.45 miles, then south on Fairview Point Road. Take Fairview Point Road 1.25 miles, then turn left onto CC Sandidge Road. Go 0.7 miles then turn right onto Pine Cove Road. Go 1.5 miles then turn left onto Johnson Drive. Go 0.15 miles then turn right onto Spring Branch Road. Facility is then 0.1 miles ahead on left.

A compressor was added to this station after September 18, 2015, which constituted a “modification” of the fugitive emission components at the facility pursuant to 40 CFR 60.5365a(j)(1). As such, the facility is subject to the leak detection and repair (LDAR) provisions found in 40 CFR 60.5397a. The affected facility covered by this report is the collection of fugitive emission components at the compressor station. As discussed in the permit renewal application for this facility (dated September 25, 2017), the reciprocating compressor is not considered an affected facility under Subpart OOOOa. This determination was validated in the permit renewal issued by LDEQ on June 25, 2018.

The compressor added at this station was placed into service on August 4, 2017. Pursuant to 40 CFR 5410a, the initial compliance period for this facility is therefore August 4, 2017 through August 3, 2018. This report covers the initial compliance period. Pursuant to 60.5420a(b), the report is due within 90 days after the end of the initial compliance period. This makes the due date November 1, 2018 and this report is therefore timely.

Pursuant to 40 CFR 60.5397a(f)(2), the initial LDAR survey for this facility was due by October 3, 2017. As shown in the attached records, the initial LDAR survey was conducted on October 2, 2017 and subsequent quarterly surveys have been completed as required.

On October 31, 2017, the entire facility was depressurized in order to address the leaks discovered during the initial LDAR survey and to prevent any further natural gas leakage until such time as the leaks were repaired. The facility remained depressurized throughout the remainder of the compliance period. Two of the leaking components were physically removed from the site in lieu of repairing or replacing them. The three remaining components were repaired as outlined in Table 2. These repairs were conducted during the next blowdown (depressurization); therefore, they were in accordance with the provisions of 40 CFR 60.5937a(h). Quarterly LDAR surveys were conducted at the site even though it was depressurized throughout the remainder of the compliance period.

Gulf South Pipeline Company, LP

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The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Tables 1 and 2 provide many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

Gulf South is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, there have been no deviations from the requirements of 40 CFR 60, Subpart OOOOa at this facility during the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "David Nickel".

David Nickel
Environmental Specialist

Attachments

cc: Bistineau Compressor Station (Koch Fee Well Air Files)

US EPA, Region VI (Submitted electronically to R6WellCompletion@epa.gov)

Table 1
Summary of LDAR Monitoring Surveys

Company Name: Gulf South Pipeline Company, LP

Facility Name: Koch Fee Well Station

Reporting Period: August 4, 2017 through August 3, 2018

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
10/2/2017	10:00 AM	12:00 PM	CR Thompson	Trained thermographer with 7 years of experience operating OGI camera	74	Sunny	5	FLIR Model 320 Optical Gas Imaging Camera	No
3/21/2018	9:00 AM	9:30 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	64	Sunny	0	FLIR Model 320 Optical Gas Imaging Camera	No
5/31/2018	10:30 AM	11:00 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	82	Sunny	5	FLIR Model 320 Optical Gas Imaging Camera	No

Table 2
Summary of Leak and Repair Data

Company Name: Gulf South Pipeline Company, LP

Facility Name: Koch Fee Well Station

Reporting Period: August 4, 2017 through August 3, 2018

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

		(vii)	(x)	(viii)	(xi)	(xi)	(xii)
Leak #	Date Discovered	Component Type	Successful Repair Date	Repaired As Required in 60.5397a(h)?	Was Delay of Repair Necessary?	Explanation for Delay of Repair (if necessary)	Repair Verification Method
1	10/2/2017	Connector	11/13/2017	Yes	Yes	Equipment was blowdown on 10/31 and then physically removed from the site during the same blowdown (on 11/13/17).	Physically Removed
2	10/2/2017	Valve	11/13/2017	Yes	Yes	Equipment was blowdown on 10/31 and then physically removed from the site during the same blowdown (on 11/13/17).	Physically Removed
3	10/2/2017	Valve	6/1/2018	Yes	Yes	Piping blowdown required in order to replace valve. Blowdown occurred on 10/31/17 and piping remained blowdown until repairs were completed.	Soap Bubbles
4	10/2/2017	Valve	6/1/2018	Yes	Yes	Piping blowdown required in order to work on valve packing. Blowdown occurred on 10/31/17 and piping remained blowdown until repairs were completed.	Soap Bubbles
5	10/2/2017	Valve	6/1/2018	Yes	Yes	Drip system must be out of service to prevent accidental dump to tanks for safety reasons. Drip system removed from service on 10/31/17 and remained down until repairs were completed.	Soap Bubbles
1Q18 survey conducted on 3/21/18. No leaks were found.							
2Q18 survey conducted on 5/31/18. No leaks were found.							

	(vii)	(vii)	(viii)	(xi)	(xi)
Survey Date	Component Type	Leaking Components Detected	Not Repaired As Required in 60.5397a(h)	Placed on Delay of Repair	Explanation for Delay of Repair (if necessary)
10/2/2017	Connector	1	0	1	See above
10/2/2017	Valve	4	0	4	See above

Note: There were no components on delay of repair at the end of the reporting period.

40 CFR 60, Subpart OOOOa Annual Report Certification Statement

I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.



Dave Perkins
Vice President – Environmental, Safety, and Security

Date: October 26, 2018